**PJS:WAB** 

# UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

) CRIM. NO. 1:CR-16- 4\
)

v.

) (Judge Rambo
)
(Electronically Filed)

RICARDO REYES

# INDICTMENT

FILED HARRISBURG, PA

THE GRAND JURY CHARGES THAT:

FEB 2 4 2016

**COUNT ONE** 

MARIA F. ELKINS, CLERK Per\_\_\_\_\_

(Abusive Sexual Contact)

On or about June 3, 2015 in Cumberland County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

#### RICARDO REYES,

within the special maritime and territorial jurisdiction of the United States, that is, at DLA Distribution Susquehanna, knowingly engaged in sexual contact, as defined in Title 18, United States Code, Section 2246 (3), with M.M., a co-worker at the DLA Distribution Susquehanna

Place, by intentionally touching her buttocks without M.M.'s permission.

All in violation of Title 18, United States Code, Section 2244 (b).

# THE GRAND JURY FURTHER CHARGES THAT:

#### COUNT TWO

(Abusive Sexual Contact)

On or about June 4, 2015 in Cumberland County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

## RICARDO REYES,

within the special maritime and territorial jurisdiction of the United States, that is, at DLA Distribution Susquehanna, knowingly engaged in sexual contact, as defined in Title 18, United States Code, Section

2246 (3), with C.S., a co-worker at the DLA Distribution Susquehanna
Place, by intentionally touching her buttocks without C.S.'s permission.
All in violation of Title 18, United States Code, Section 2244 (b).

### THE GRAND JURY FURTHER CHARGES THAT:

#### **COUNT THREE**

(Abusive Sexual Contact)

On or about June 4, 2015 in Cumberland County, Pennsylvania, within the Middle District of Pennsylvania, and elsewhere, the defendant,

# RICARDO REYES,

within the special maritime and territorial jurisdiction of the United States, that is, at DLA Distribution Susquehanna, knowingly engaged in sexual contact, as defined in Title 18, United States Code, Section 2246 (3), with M.McM., a co-worker at the DLA Distribution

Susquehanna Place, by intentionally touching her buttocks without M.McM.'s permission.

All in violation of Title 18, United States Code, Section 2244 (b).

A TRUE BILL

Foreperson

PETER J. SMITH UNITED STATES ATTORNEY

BY:

William A. Behe

Assistant United States Attorney